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May 14, 2012

VIA ECF

The Hon. Steven M. Gold
Chief United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Lebovits, et al., No. 11 Crim. 134 (SJ-SMG)

Dear Chief Judge Gold:

I represent Moses Neuman in the above-referenced matter. With the government's consent, I am requesting a third extension of the filing deadline for Mr. Neuman's reply brief, which is currently due on May 18. This request does not apply to the filing deadline for the other moving defendants.

The reason for my request is that I am still on trial before Judge Block in the *United States v. Espada* case. In my March 9 letter to Your Honor requesting the first extension, I anticipated that the *Espada* trial would last until approximately mid-April. In my April 6 letter requesting the second extension, I estimated that the trial would last through the end of April, and possibly into early May. It is now the third week of May and the *Espada* trial has not yet concluded. Due to the demands of the *Espada* trial, the additional two weeks requested herein are necessary to prepare the reply brief on behalf of Mr. Neuman.

This requested extension would affect the May 22 telephone conference with Your Honor. AUSA Charles Kleinberg will not be available the week of June 4, so we request that the conference be rescheduled to Monday, June 11, or as soon thereafter as Your Honor can schedule the conference. Mr. Kleinberg requests that, if at all possible, the Court schedule the conference for no later than the week of June 11.

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Thank you for your consideration.

Respectfully submitted,

s/Susan R. Necheles
Susan R. Necheles

cc: All Counsel (*via ECF*)